

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

SANTOSH BHARDWAJ,

Plaintiff,

- against -

**PRABHU DAYAL, CHANDINI DAYAL, AND
AKANSHA DAYAL,**

Defendants.

Civil Action No.11 Civ. 4170 (AKH)

PRABHU DAYAL,

Counterclaim-Plaintiff,

- against -

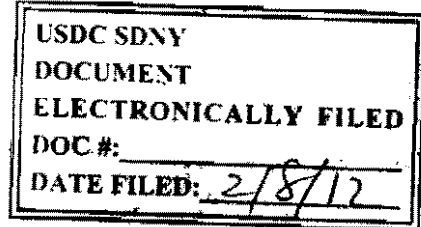
SANTOSH BHARDWAJ,

Counterclaim-Defendant,

- and -

HOLLIS PFITSCH AND THE LEGAL AID SOCIETY,

Additional Defendants on Counterclaims.



STIPULATION AND PROPOSED ORDER

WHEREAS, on February 3, 2012, Defendants filed their Second Amended Answer and First Amended Counterclaims of Defendant Prabhu Dayal, adding as Counterclaim-Defendants Hollis Pfitsch and The Legal Aid Society;

WHEREAS, on February 7, 2012, Cahill Gordon & Reindel LLP appeared in this action as counsel for Hollis Pfitsch and The Legal Aid Society;

-2-

WHEREAS, Hollis Pfitsch and The Legal Aid Society have requested, and counsel for Prabhu Dayal has consented to, a brief extension of the February 17, 2012 deadline set by the Court's January 20, 2012 order for filing motions to dismiss, in order to permit their new counsel additional time to prepare a motion to dismiss the counterclaims;

WHEREAS, subject to the Court's approval, the parties have agreed to extend by twenty (20) days the current schedule for filing and briefing of motions to dismiss Defendant Prabhu Dayal's counterclaims; and

WHEREAS, no prior request has been made for extension of these deadlines.

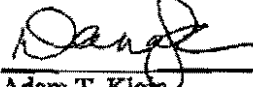
NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, that:

1. The Counterclaim Defendants shall have until March 8, 2012, in which to move to dismiss the Counterclaims.
2. The Counterclaim Plaintiff shall have until March 22, 2012, in which to oppose the motions.
3. The Counterclaim Defendants shall have until March 29, 2012, in which to file reply papers in support of their motions.
4. The oral argument previously scheduled for March 15, 2012 at 4:00 p.m. shall be adjourned to another date and time set by the Court.

-3-

Dated: February 8, 2012

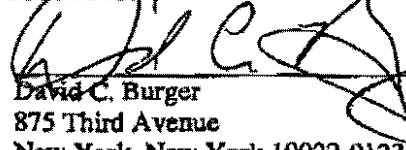
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-4-


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SO ORDERED:


United States District Court
2/8/12